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March 1, 2011

**Electronic Submission**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

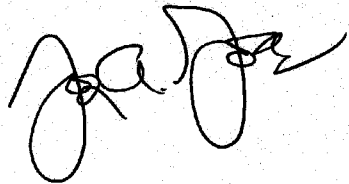
**Re: PLDT (US) Ltd. Certification of CPNI Filing,  
EB Docket No. 06-36**

Dear Ms. Dortch:

PLDT (US) Ltd. hereby submits the attached annual CPNI certification and compliance statement.

Please do not hesitate to address any questions to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Joe Godles', with a stylized flourish at the end.

Joseph A. Godles  
*Counsel to PLDT (US) Ltd.*

cc: FCC@BCPIWEB.COM

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2010

Date filed: March 1, 2011

Name of company covered by this certification: PLDT (US) Ltd. ("PLDT US").

Name of signatory: Evarcito Ocampo

Title of signatory: President

I, Evarcito Ocampo, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed \_\_\_\_\_/s/ Evarcito Ocampo

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## **ANNUAL CPNI COMPLIANCE STATEMENT AS REQUIRED BY SECTION 64.2009(e) OF THE FCC'S RULES**

The following statement explains how operating procedures followed by PLDT (US) Ltd. ("PLDT US") ensure that it complies with the Customer Proprietary Network Information ("CPNI") rules established by the Federal Communications Commission (*i.e.*, 47 C.F.R., Part 64, Subpart U).

To the extent PLDT US has access to CPNI as defined by Section 222(h)(1) of the Communications Act,<sup>1</sup> it does not use CPNI for marketing or any other purpose prohibited or otherwise limited by the Commission's CPNI rules. In fact, PLDT US does not engage in any marketing activities within the United States. In addition, PLDT US does not share any CPNI information with any third parties, including any affiliates, joint venture partners, or contractors, except in accordance with the Commission's rules.<sup>2</sup>

PLDT US employees are informed of the appropriate use of CPNI, and are subject to disciplinary action for any violations.

Because PLDT US does not use CPNI and does not engage in any marketing activities in the United States, it does not presently (1) have in place a system by which the status of a customer's CPNI approval can be clearly established (no approval is sought because the CPNI is not used), (2) maintain a record of its sales and marketing campaigns that use its customers' CPNI (there are no such campaigns), and (3) have in place a supervisory review process with respect to outbound marketing situations (there is no outbound marketing). However, PLDT US stands ready to comply with these provisions of the Commission's CPNI rules should it begin using CPNI for marketing or other purposes not permitted by the rules.

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<sup>1</sup> The only services offered by PLDT US in the United States are international private line services between the United States and the Philippines.

<sup>2</sup> The only third party with whom PLDT US may share CPNI in certain instances is its parent company, Philippine Long Distance Telephone Company ("PLDT").